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Honorable Judge Marc Barreca

Hearing Location: Marysville, Courtroom 1

Hearing Date: October 14, 2015

Hearing Time: 10:00 a.m.

Response Date: October 7, 2015

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

IN RE:

DANELLE KING, FKA DANELLE HAINES
AND
BRANDI N KING, AKA BEAU KING, FKA
BRANDI NICOLE WOOD

Debtors.

CHAPTER 7 BANKRUPTCY

NO.: 15-14531-MLB

**MOTION FOR RELIEF FROM STAY
OR IN THE ALTERNATIVE FOR
ADEQUATE PROTECTION
BY AMERICREDIT FINANCIAL
SERVICES, INC. DBA GM FINANCIAL**

Americredit Financial Services, Inc. dba GM Financial ("Creditor") moves the Court for an order terminating the automatic stay pursuant to 11 U.S.C. Section 362(d) to permit it to take any and all actions necessary to sell the following described personal property and apply the proceeds to Creditor debt: 2014 Chevrolet Cruze VIN: 1G1PA5SGXE7239260. Creditor also moves the Court that enforcement of this order not be stayed for fourteen (14) days pursuant to F.R.B.P 4001(a)(3).

The Debtors purchased a 2014 Chevrolet Cruze VIN: 1G1PA5SGXE7239260 (the "Vehicle"), under the Retail Installment Sale Contract dated January 8, 2014 attached as Exhibit A to the declaration on file with the court.

Creditor has a valid and perfected security interest in the Vehicle as shown on Exhibit B to the declaration on file with the court.

1 Debtors' monthly payments under the attached contract are \$453.53. The contract is past
2 due for May 22, 2015 and all subsequent payments. The total amount past due under the contract
3 is \$1,814.12 as of September 4, 2015.

4 Debtor's filed Statement of Intention indicates intent to surrender.

5 It is not known what, if any, equity there is in the Vehicle since Creditor has not had the
6 opportunity to inspect the Vehicle and does not have information on the Vehicle's condition.
7 However, the outstanding balance due to Creditor is \$21,425.53 as of September 4, 2015.
8

9 Creditor moves for relief based on the grounds that (1) the Debtors are delinquent on
10 Retail Installment Contract payments; (2) the interest of Creditor in the Vehicle is not adequately
11 protected and (3) it is not necessary for an effective reorganization.
12

13 THEREFORE, Creditor requests this Court enter an order terminating the automatic stay
14 so that Creditor may be allowed to take any and all actions necessary to sell the Vehicle and
15 apply the proceeds to the balance owing to Creditor.
16

17
18 DATED this 10th day of September, 2015.

19 **RCO LEGAL, P.S.**

20
21 /s/ Jennifer L Aspaas
22 Jennifer L. Aspaas, WSBA# 26303
23 Attorney for Creditor
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